**Increasing Accuracy of NSLP Reporting**

***Executive Summary***

The National School Lunch Program (NSLP) is operated by the federal government to help families in need provide food for their children while at school. However, not all eligible students are enrolled in the program for multiple reasons. This report analyses the reasons why students are not enrolling in the NSLP program and how that adversely impacts the schools in receiving other federal funds, such as E-Rate, based off these enrollment percentages. Through my research, it has been determined that the complexity of filling out the forms and the stigma attached to that action are two of the largest barriers to enrollment of their children in NSLP. I will examine the following factors that aid in the disproportion of data between the enrollment of NSLP and receiving E-Rate funding:

* Why under-enrollment in NSLP exists
* How that effects E-Rate funding for schools
* Methods to increase participation in the program

1. ***Background***

In 1946, Congress passed the National School Lunch Act which created the National School Lunch Program that was designed to ensure that participating students have affordable and nutritional meal options while at school. The National School Lunch Program is a federally supported meal program that operates in public and nonprofit private schools in addition to residential child care institutions (USDA, 2012). In essence, the program provides students with a nutritionally balanced, free or reduced cost lunch at school every day. Schools who qualify and participate in this program receive cash subsidies as well as USDA foods from the Department of Agriculture for each meal served (USDA, 2012). In return, the schools must provide lunches to the students who qualify for the program at a free or reduced cost. Children whose household income is at or below 130 percent of the federal poverty level are eligible for free meals. While children from families with incomes between 130 and 185 percent are eligible for reduced-price meals; however, the cost of meals shall not exceed 40 cents per meal. To give some perspective, a household income that represents 130 percent of the federal poverty level is approximately $29,965 and 185 percent is approximately $42,643 for a family of four (USDA, 2012).

How does this relate to the E-Rate program? The federal E-Rate program provides schools and libraries discounts of up to 90 percent to receive affordable telecommunications and Internet Access that allow students access to global resources. NSLP is the primary measure for determining an applicant’s discount percentage in the federal E-Rate program. The Federal Communications Commission, the governing body of the E-Rate program, considers the National School Lunch Program to be the most accurate measure of a schools level of need than other sanctioned, poverty-focused programs. The accuracy in determining the proper NSLP discount level directly affects the discount in the federal E-Rate program which ultimately affects the school and student learning environment. The more impoverished the school district, the higher their percentage is with E-Rate and the higher their discount will be on telecommunications and Internet access for classroom connectivity. The leading way to collect NSLP data is to ascertain the income level of each student through an application process which requires the parents to provide an accurate income level as well as the student to follow through in returning the information to the school. Any disruption of this process can dynamically impact the accuracy of this data.

The problem with using NSLP data for an accurate E-Rate discount is the inherent noncompliance that can occur from students and parents in returning the all-important NSLP forms. The E-Rate consequences can be substantial for a school. For example, the district may have 75 percent of its student population that actually qualify for free and reduced lunches, which equates to a 90 percent E-Rate discount, but only 60 percent return their NSLP applications which bumps them to a lower E-Rate discount of 80 percent. This is precisely where my research is focused. It was my goal to determine what factors cause this precarious blunder to occur and what measures can be taken to correct it so that skewed data does not undesirably impact the students. The increased participation in returning these NSLP forms or the use of data from other programs can have a profound effect on the increase in a school’s E-Rate discount which will more accurately reflect their true need. Increasing a school’s E-Rate discounts means more federal funding for technology in the district thus enabling the use of digital tools and fostering a higher level of 21st Century learning.

1. ***Literature Review***

In a perfect world where all NSLP forms were completed and returned in the required timeframe, all schools and libraries who participate in the E-Rate program would receive an accurate E-Rate discount in proportion to their true need. However, research illustrates this is not what is happening. My study will shed light on ways in which the school district or library can improve the likelihood of gathering more accurate NSLP data to further enhance their technology in the classroom. For instance, higher E-Rate discounts can allow schools the affordability to install better conduit and cabling connectivity within the four walls of the classroom and throughout the district through which data travels to the cloud. Enhancing and upgrading network infrastructure for schools is the fundamental way to connect every student to the cloud in a reliable and efficient manner; however, it is extremely costly to the school. Without E-Rate discounts, grants or bonds, it is nearly impossible for schools to make these upgrades in their technology infrastructure that are critical to 21st Century learning. In order to clarify the basic purpose of the E-Rate program, it is important to know that E-Rate funding does not cover end-user devices such as computers, iPads, mobile learning devices, etc. but rather it funds most of the connectivity by which all those devices connect to the Internet.

In a study by Freeman, et al (2012), the two main reasons for non-compliance in NSLP enrollment are the complexity of filling out the forms and the perceived stigma associated with being eligible for assistance. Both reasons are understandable barriers that should be overcome with a few simple interventions. According to Freeman et al (2012), “literature shows that forms pose a significant barrier in the use of social programs, whereas enrollment increases when systems are enhanced by automatic or default enrollment” (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012). The most common process to gather NSLP data is by having parents fill out a form indicating their household income and having their child turn it in at the beginning of the school year. Furthermore, the school is accountable to make sure all forms get to the parents and are returned in a timely manner. Once the school reports the numbers to the state, the Department of Agriculture in Texas is responsible for operating the program (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012).

The complexity of the form itself can also deter families from completing them. Some reasons include the small print of the form, difficult instructions, and the challenge of determining their true income (perhaps because of income fluctuation) in order to determine what to put on the form. Low literacy also plays a role in states such as Texas where there is a large volume of immigrants who cannot read in English and simply cannot fill out the forms. Errors in enrollment are due to that fact that the NSLP forms request household income at the time in which they are filed. Principally, parents are asked to report their gross income for each member of the household as stated on their paychecks and the frequency in which they are paid whether it’s weekly, bi-monthly or monthly. The reality for many Americans is the contract labor phenomenon where there may be a lot of work for a few months and then a huge dip in work creating an ebb and flow of income. This type of family income will not be reflected in these types of surveys depending on the time of year which could skew the data to indicate under-enrollment or over-enrollment (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012).

Stigma is the other main reason why parents and students do not enroll in NSLP. This is especially true in small, tight knit communities where everyone knows everyone. It is perfectly plausible that parents elect not to fill out the forms because they don’t want to reveal they do not understand the instructions or they need assistance in this program. In small communities, such as Waco where I live, parents may see the school administrators out in public and may feel embarrassed that they need help and appear disadvantaged. Some families who apply for government assistance sense that the community will know about it which further perpetuates the stigma. This is especially true in communities where these families also make up the minority population.

Another level of involvedness is student stigma whereby the students feel all these sentiments when they are the ones that must turn in the forms and their peers know their situation program (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012). Typically, elementary students are more prone to following through in returning the forms because they ‘do what their teachers/parents tell them to do’ or they simply do not think of the consequences of what others might think at that age. Elementary students are more persuaded and formed by the adults who are important to them, such as their parents and teachers. If the parent of an elementary student is an advocate for enrolling in NSLP, the child will most likely hold the same beliefs and attitude as that parent and vice versa (The Journal of Child Nutrition & Management, 2002). Either way, they are more actively involved in the enrollment of NSLP whereas the older students such as middle school and high school age are not so much. The stigma is much more prevalent in these older age groups where peer pressure and others opinions are more pervasive.

1. ***Action Research Design***

Through my research in determining the cause of skewed data in NSLP reporting, I called upon two district personnel who have extensive knowledge in this area of expertise. I wanted to find out what they consider to be the biggest barriers in receiving the NSLP forms. I decided to gather substantial, first-hand information on the different processes of gathering NSLP data and the varying success of these processes. I began my research in September 2011 and completed it in March of 2013. By asking a series of open-ended questions to each of my interviewees, I was able to capture the essence of my findings as well as a few ideas to improve the process.

Suzanne Murdough, Food Service Manager for Lorena Independent School District, offered information pertaining to her success with NSLP data. Suzanne indicated that her district still handles this process manually rather than digitally and that is still works well for her school as she gets approximately a 90 percent return rate of the applications. Perhaps one reason for success is because her school has only 28% economically disadvantaged so there are not many students and parents to reach for the return of these forms. Or perhaps it is because the principal and/or counselor who present the registration packets (which contain the NSLP form) to the parents encourage all parents, regardless of their qualification in the program, to complete and return the forms. This also helps to minimize the level of embarrassment and stigma involved in the process. When asked if she believes her process truly represents the economically disadvantaged student count, she stated that it may not be totally accurate in certain ways. Some parents who do as they are told and complete the form even though they believe they do not qualify, simply strike-through the income part of the form. Suzanne believes that by doing this, some parents may be missing out on benefits of this program who actually qualify for assistance. While others may be falsifying their actual income so they can qualify for assistance. If the district believes there is a family who has falsely indicated their income so they can receive free or reduced lunches for their children, they do not inquire further because if they do this for one family, they must do it to all of them and they do not want the administrative burden. Another measure Suzanne makes for enhancing her NSLP data is to do a sibling match with their student software program, PowerSchool, which matches students up with siblings sharing the same address and phone number although her district finds that only 10-15 additional students are counted each year by using this method. Overall, Suzanne believes their current system in getting NSLP data works well for her district.

The second person interviewed was Linda Raney with ESC Region 12. Linda is the PEIMS Specialist in the Information Systems Department and comes from an area school district with 16 years’ experience in managing NSLP and PEIMS data. She thinks back on the process she managed in her district and stated that the NSLP forms went home with the students during the first week of school and were requested to be returned by a certain date early in the school year (she seems to remember September 1). If the district did not get a completed form from all the students by the deadline, the district was allowed to pull the form(s) from last year for those who qualified for NSLP and automatically count them for this year. She stated that some of the success strategies used at her district was that the teachers passed out the NSLP forms in home room class and asked to return them to a designated secretary (not the teacher) to help minimize embarrassment. Also, each student in the district was given a Personal Identification Number (PIN) to use when going through the lunch line, regardless of their qualification status in NSLP. This way, students could not distinguish the advantaged from the disadvantaged. Linda said that when the students began using PIN’s in the lunch line, this greatly helped increase the return rate of the NSLP forms because they began to feel more equality and the stigma began to dissipate . She further indicated that she did not believe this process gave a proper depiction of the economically disadvantaged student population and she believed there were several things that could have been done differently. For instance, she stated they did not perform sibling matches and they also did not do any outreach to the families in trying to get the return forms. She recommended that perhaps schools could request an eligibility list from the Department of Human Services for all the students in the district that qualify for Food Stamps and use that list for direct certification. Overall, Linda believed that the NSLP process was successful but could focus on areas of improvement to make it even better.

1. ***Findings***

Due to the fact that this is a nationwide issue, many states have implemented different methods of collecting NSLP data that effectively maximize the confidentiality of the enrollees. Most of these methods involve the use of technology and digital tools that may also keep the identity of the families anonymous. This not only increases enrollment but has also proven to minimize administrations costs due to a reduction in paperwork and efficiency. Most states are pursuing online applications and data sharing with other agencies to cross check with similar programs, such as direct certification. Moving to a technology-based system can reduce administrative burdens by essentially removing the burden of paperwork as well as time spent processing applications. Parents are more inclined to fill out a form online with the assurance that their identity will be kept anonymous, unlike paper forms (National Academy for State Health Policy, 2009).

The state of Vermont has elected to encourage all students regardless of income and eligibility to return their forms to the school in order to increase anonymity and stigma association (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012). Furthermore, these Vermont schools make an outreach to all parents requesting they return the forms even if they are incomplete which fosters equality as well as reaches those families who think they may be ineligible when, in fact, they are eligible (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012). Evening the playing field by requiring all families to fill out the forms offers the parents zero leeway in avoiding the paperwork provides a likely solution and one that is working in several states, including Texas. In order to address the complexity of the forms, Vermont schools offer the applications forms in multiple languages so that all families are able to understand the content of them (Under-Enrollment and Under-Participation in Vermont’s School Lunch Program, 2012).

Other methods are proving themselves useful such as creating a district-wide campaign that gives teachers a goal to have all students return the forms and giving an incentive in return. Such as free breakfast for two weeks or a pizza or ice cream party for the class who reaches this goal. Another idea could be to host an open house and provide free dinner to families and get any help they need in filling out the forms thus helping to eliminate the complexity barrier. Increasing awareness of the importance of the impact of returning this information and the significant effect it has on technology funding, such as E-Rate. Setting up high profile booths during school registration for NSLP applications is something I think will increase enrollment figures. This will invariably increase awareness of the importance of the program as well as provide parents who need assistance to ask questions and even offer a time where the parents can sit down and work with a school employee to fill out the forms.

In all my research, it is apparent to me that the crux of the issue is lack of awareness of the importance of the data and what accurate data will allow for students to do. Another way to intervene and overcome the associated stigma is to counsel parents and students on the positive impact of NSLP data on digital learning and affordable technology. It is important to make them aware of the far-reaching effects of submitting accurate NSLP data beyond just free and reduced lunches. An awareness campaign could support this mission by starting off with a highly energetic presentation at the first PEP rally of the year and provide visual aids depicting what technology and digital tools would be affordable if all students who are eligible returned their NSLP forms. Also, brochures and literature could be disseminated that depict the direct correlation of accurate NSLP data to higher E-Rate discounts for schools and how that provides students more access to digital tools and 21st Century learning.

1. ***Conclusions and Recommendations***

Since we know schools receive the federal assistance by what it attained in this important data collection, it only makes sense to figure out an initiative that improves this process. Through the process of using electronic forms, matching of data through various programs can now be accomplished which will directly enroll parents in similar programs that use the same data. In fact, some states, including Texas, have received grants from the USDA that increase the direct enrollment of these students in school meal programs through direct certification and verification processes (USDA, 2010). Direct certification programs were introduced by the Child Nutrition and WIC Reauthorization Act of 2004 (E-Rate Central, 2012). As stated by the United States Department of Agriculture in a news release on March 9, 2010, “direct certification allows States and local educational agencies to automatically certify children enrolled in the Supplemental Nutrition Assistance Program (SNAP) or the Temporary Assistance to Needy Families Program (TANF) for free school meals without the need for household applications” (USDA, 2010). This is groundbreaking in my action research focus. Obviously this issue has been prevalent for some time throughout the nation, so much as to warrant approximately $1.9 million in grants to five State agencies to address the problem (USDA, 2010).

Under the direct certification process, there are two ways in which students can be identified and enrolled in NSLP:

1. The state can send a letter to the families participating in SNAP informing them that their child is eligible for free school meals; in turn, these parents must present this letter to the school to participate in the program. This method still involves proactive involvement by the parents and students to present the letter to the school, otherwise, the benefits do not commence. According to E-Rate Central, a leading E-Rate Consulting firm out of New York, this process has done little to increase enrollment and participation, predominantly at a secondary school level (E-Rate Central, 2012).
2. The school must perform direct certification searches at a frequency of three times a year to match student enrollment lists with SNAP and other assistance programs, which automatically enrolls them in NSLP. In this scenario, families still have the option to withdraw their participation in NSLP but this must be done proactively. This approach is expected to reveal considerably higher NSLP participation and, in most cases, higher E-Rate discounts.

Another method to increase the eligibility of students in NSLP is to use already gathered data and perform a sibling match. This can be done by identifying students who are enrolled in NSLP and match them with their sibling(s) by using an address or phone number. This process is easiest done through an electronic program or database and benefits the school by combating the issue whereby older students, usually high school and middle school, who do not return the forms can automatically qualify for NSLP because their siblings, usually elementary students, turn in their forms and enroll in NSLP.

Income surveys are another method that can be implemented when NSLP data is either not available or does not give an accurate count of the economically disadvantaged student count. However, NSLP forms may not be used as the survey itself but rather there are specific guidelines that must be followed:

* The survey must be sent to all families in the district/school
* The survey must contain the following details:
  + Name of family and students
  + Size of family
  + Household income level

Furthermore, data collected from a survey must not be more than two years old, which means they must be performed every other school year (North Dakota State Government, 2011). If a school receives at least a 50 percent return on surveys from all families, that data may be extrapolated to 100 percent of the student population to determine the percentage of eligibility. For example, a school with 100 student enrollment sent surveys to all families and 50 percent returned the survey form to the school (North Dakota State Government, 2011). The data collected from the surveys shows that 25 percent of the 50 percent qualify for NSLP (within 185 percent of federal poverty level). This means that 50 percent of the students involved in the survey are eligible for NSLP, which can be extrapolated to the entire student population making the school 50 percent eligible for NSLP (North Dakota State Government, 2011). As with most federal programs, all guidelines listed above must be met and proven with documentation in order to produce credentials upon request. As with returning NSLP forms, the noncompliance issue still happens with this method so chances for success increase if you combine the survey distribution with an event that would bring many families together so you can explain the importance of this data. Furthermore, having school officials, such as the Superintendent, make a personal plea to these families for their involvement and explain how that translates into more money back to the school for E-Rate and educational technology.

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